FRANK BELL, CSBN 038955 1 A Law Corporation 333 Bradford Street, Suite 270 Redwood City, California 94063 Tel: (650)365-8300 3 Fax: (650) 366-8987 4 Attorney for Defendant 5 JOHN WAYNE PRICE 6 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 11 12 UNITED STATES OF AMERICA, No. CR 12-0061 EMC (MEJ) Plaintiff, 13 APPLICATION AND [PROPOSED] ORDER FOR PERMISSION TO 14 TRAVEL TO MISSOURI CITY, V. TEXAS A SECOND TIME 15 JOHN WAYNE PRICE, 16 17 Defendant. 18 19 Comes now defendant, JOHN WAYNE PRICE, by and through his counsel, and defendant requests permission of the court 20 to travel to Missouri City, Texas to visit the woman who is 21 22 carrying his child, Shanika Henderson, who resides at 1735 23 Corona Del Mar, Missouri City, Texas and who is having serious complications with her pregnancy and is on bed rest. 24 25 The baby will likely be induced on February 4, 2013. 26 Defendant plans to leave very soon and he plans to stay four 27

APP AND [PROPOSED] ORDER FOR SECOND TRAVEL TO TEXAS

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one and a half weeks (1 1/2)

(4) to six (6) weeks in Texas for the birth and afterwards to bond with the baby. While in Texas he will stay at the Corona Del Mar residence. Defendant plans to take air transportation to Texas and will keep in touch with his pretrial services officer. He believes that he will fly to Houston and return.

Defendant was released on February 14, 2012 on a \$75,000.00 bond secured by the signatures of his two sisters and his former wife, Tylene Leslie. He has been supervised by Pretrial Services since that date.

Defendant has a business of home repair and refurbishment in the City of Tracy area along with his former wife, Tylene Leslie, who is one of his sureties. Ms Leslie is his business manager. She arranges for his work and his schedule. These jobs are all located in the Eastern District of California in the Tracy area.

Pretrial Services Officers, Gelareh Farahmand and Josh Libby (415) 436-7513 have no objections to his travel as indicated so long as, prior to his travel, he provides to Pretrial Services his itinerary, including his flight information and his accommodations, that he call Pretrial Services once each week while he is gone and that he contact her by telephone upon his return.

Dated: January 27, 2013

/S/_Frank Bell_____FRANK BELL
Attorney for Defendant
JOHN WAYNE PRICE

1	<u>ORDER</u>
2	On the application of counsel and good cause appearing;
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4	IT IS HEREBY SO ORDERED: Defendant shall have 1 1/2 weeks in Texas for stay.
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6	Dated: January 30, 2013 Hon. MARIA-ELANA JAMES
7	U.S. Magistrate Judge
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